



EPA comments on Dec 09 Monthly PSVP Data Submittal

Lynda Deschambault to: Ed Modiano

02/23/2010 02:51 PM

Cc: Tom.Perina, deschambault.lynda, "charles comstock"

Attached please find our comments on OPOG's first monthly progress report for the OU1 Pump and Treat Groundwater System. Under the PSVP the first report was submitted to EPA on December 21, 2009.

OPOG has since provided two monthly progress reports for January and February. We will provide separate comments on those submittals, and expect to have those to you next week.

Lynda

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-----Forwarded by Lynda Deschambault/R9/USEPA/US on 02/23/2010 02:38PM -----

To: Lynda Deschambault/R9/USEPA/US@EPA
From: "Ed Modiano" <edm@demaximis.com>
Date: 12/21/2009 07:34PM
cc: <ChamberlinDC@cdm.com>, <WallinSL@cdm.com>, <LParnass@dtsc.ca.gov>, <cocomstock@itsi.com>
Subject: Omega Site: Monthly PSVP Data Submittal

Lynda:

Attached for review by the USEPA is the initial Remedy Performance Data Submittal for the Omega Chemical Superfund site. This Data Submittal is being transmitted per the USEPA approved April 2007 Performance Standards Verification Plan (PSVP). As USEPA is aware the groundwater treatment system (GWTS) has been operational on a full-time basis since July 25, 2009. The attached Data Submittal summarizes GWTS water level and water quality data collected during the period July 25th through November 30th.

If you have any questions or require additional information, please contact me.

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PSVP Monthly Data Submittal 2009.12.21.pdf EPA comments on MonthlyPSVP 02.23.10.doc



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, California

February 23, 2010

Mr. Ed Modiano

RE: Comments on Monthly *Remedy Performance Monitoring Plan Report for 2009, Omega Chemical Superfund Site EE/CA Groundwater Remedy*, dated December 2009,

Dear Mr. Modiano:

The document titled *Remedy Performance Monitoring Plan Report for 2009, Omega Chemical Superfund Site EE/CA Groundwater Remedy*, dated December 2009, prepared by CDM on behalf of the Omega Chemical Site PRP Organized Group (OPOG) was submitted to EPA on 21 December 2009. Two additional monthly reports were submitted in January and February using a similar format.

These documents are submitted per the Performance Standards Verification Plan (PSVP). The first initial submittal summarized performance data collected during the period 25 July 2009 through 30 November 2009. The additional monthly reports cover a 30 day period per the PSVP.

Comments on the December 21, 2009 submittal are listed below. The comments have been separated into (1) general comments and observations, and (2) specific comments that—while they may have implications for other sections of the report—are keyed to a certain section of the report.

I. General Comments and Observations

- While it is presumed that a more in-depth data interpretation of the data will be provided in the Quarterly OMMM Reports and the Annual Performance Evaluation submittal, this needs to be clarified in the introductory section. Please elaborate on where and when data interpretation will be presented.
- The introductory section needs to provide basic information describing data sources. Please provide a summary discussion regarding how the data was obtained (e.g., water level data was obtained from data loggers and/or water level probes during monitoring events; analytical data review-validation was/was not conducted) to give the reader a sense of whether the data presented in the attachments are strictly preliminary or have gone through some level of review.
- Please discuss the following for each of the attachments.
 - Attachment 1: Describe how the groundwater elevation data was collected; provide a summary of the wells that are monitored and those used for the groundwater elevation contour map. Provide groundwater water level field forms for those wells not monitored by transducers.
 - Attachment 2: Provide a brief discussion of the data presented (current versus historical); the level of review associated with the current data; and a summary of wells being monitored. Please indicate that a Quality Control Summary

Report that discusses analytical data validation and quality of analytical data, including laboratory reports, will be provided in the Quarterly OMMM Reports.

- Attachment 3: Provide a brief discussion of the data presented; the level of review associated with data; and that the data were collected in accordance with the OMMM.
- No backup or original data is included in this report. Please include supporting documentation for the data in the tables and figures (i.e., lab reports, field forms, validation reports, etc.).

II. Specific Comments

Section – Total Groundwater Treated and Mass Removed

- It is unclear how the removal of 146 pounds of VOCs was calculated. Please provide a discussion of how extraction well volumes or discharge volumes were used for mass removal calculations, and how average VOC concentrations were determined and used for mass calculations.

Attachment 1 – Groundwater Elevation Summary Tables, Hydrographs, and Groundwater Elevation Contour Map

- Table 1, Summary of Groundwater Elevations, General: Table 1 has various undefined or poorly defined conventions and acronyms: i.e. “NA,” “NM,” “-,” and “DRY.” Please clarify whether the “NA” and the “-” both signify that the water level was not measured or that the well was dry. Please standardized and define all abbreviations.
- Table 1, Summary of Groundwater Elevations, Page 5: The data for dry wells varies throughout the table. i.e. OW-2 on 8/12/09, on page 5, states the depth to as “DRY” and no groundwater elevation is listed. The same well, measured on 11/4/09, states the depth to water is DRY (>80) and the groundwater elevation is given as <120.10. Please adopt a consistent manner of presentation throughout the table.
- Groundwater Elevation Contour Figure 1-4: Please post the groundwater level elevations used to create the elevation contour map for each of the wells on the figure.

Attachment 2 – Summary of Extraction and Monitoring Wells Analytical Results and Graphs

- Attachment 2 starts at Table 3, Chlorinated VOCs Analytical Summary, General, Please provide Tables 1 and 2.
- Table 5, Cyanide, Hexavalent Chromium, Perchlorate, 1,4-Dioxane, and 1,2,3-Trichloropropane Analytical Summary, Page 7: The legend references sample types such as EPA, EPAD, and M that are not used in the table. Please delete if not relevant.
- Please provide a PCE concentration contour map. Please use the same scale as the groundwater elevation contour map.

Attachment 3 – Treatment Plant Operations Summary Tables and Graphs

- Table 1, Groundwater System Summary: Please provide sufficient detail to understand and reproduce the mass removal calculations. Also, please reconcile the mass removal results presented in this table 1 with those presented on Figure 3. Note that the text on

page 2 says that the combined flow rate in December 2009 was 13.4 gpm and Table 3-1 states a combined flow rate of 15.2 gpm for the same month (i.e., 13% greater). Please reconcile/explain.

- Tables 5 and 6: There appears to be a disconnect between these two tables. What is the purpose of Table 5? The detects presented in this table are only for results on November 24, 2009. Table 6 appears to have all of the information compiled in one table.